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Attorneys for Plaintiff,
OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OWEN DIAZ,
Plaintiff,
v.
TESLA, INC. dba TESLA MOTORS, INC.;
Defendant.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF
LAWRENCE A. ORGAN IN SUPPORT
OF PLAINTIFF'S APPLICATION FOR
REASONABLE ATTORNEYS' FEES AND
EXPENSES**

Retrial Date: March 27, 2023
Complaint filed: October 16, 2017
Hearing: January 10, 2024

SUPPLEMENTAL DECLARATION OF LAWRENCE A. ORGAN

I, Lawrence A. Organ, declare and state as follows:

1. I make this declaration of my own personal knowledge, except where stated upon information and belief, and if called as a witness, I would and could testify competently to the matters stated herein.

2. I am an attorney admitted to practice in the State of California and have been a member of the State Bar of California since 1994. I am admitted to practice in the U.S. District Court for the Northern District as well as the United States Supreme Court. I am currently a member in good standing with the Bar and I have never had any issues relating to discipline or otherwise with the State Bar.

SLIGHTLY REVISED CALCULATIONS

3. After reviewing Defendant Tesla's opposition papers, I went back to the spreadsheets documenting Plaintiff's requested time and I checked all entries and calculations. Under my direction, I also had my paralegal Sabrina Grislis check my work to ensure that any revised times and requests submitted to the Court would be accurate and fully consistent with Plaintiff's time records, including the records attached to my prior declaration and the declarations of co-counsel Bernard Alexander, Michael Rubin, and Dustin Collier. The Revised Exhibit 1: Base Lodestar Without Multipliers is the result of this process. This revised document is attached hereto as **Exhibit 11** to this Supplemental Declaration to avoid causing confusion with the original Exhibit 1.

4. My explanation for the differences in my firm's lodestar are detailed further here. The numbers in the chart set forth and in **Exhibit 11** vary slightly from the numbers detailed in my prior declaration and its Exhibit 1. I discovered that when exercising billing judgment and revising the final numbers for the previous chart, I made some minor errors when subtracting certain time adjustments. For example, that chart listed 2,356.4 hours for my time which was correct based on billing judgments, but the lodestar number (rates times hours) Plaintiff presented (\$2,368,372.50) inadvertently included hours spent before that final exercise of billing judgments. The actual number of non-fees-on-fees lodestar hours for my time is just 0.1 hour

higher than the number calculated by Tesla. (See Decl. Dan Posner Ex. A) Stated differently, in the exercise of billing judgment I reduced my time by 72.7 hours, not the 69.7 hours as set forth in ¶60 of my prior declaration, for a revised lodestar of \$2,297,490. Our recent review of counsels' time records also showed that we slightly previously undercounted my associate Cimone Nunley's time. Tesla is correct that Plaintiff is claiming 1,520.5 hours for her time (*see* Exhibit 11; Decl. Dan Posner Ex. A), which is slightly more than the 1,518.7 hours calculated in Exhibit 1. As a result, the requested lodestar for Ms. Nunley's time is slightly higher at \$760,250 than previously requested. (Accord, Decl. Dan Posner Ex. B). With respect to the time of Ms. Avloni, we were correct that her total hours were 449, which is what we originally submitted, although Tesla calculated those hours to be 449.3. (See Decl. Dan Posner Ex. A) Accordingly, Ms. Avloni's requested lodestar continues to be \$325,525. Finally, Ms. Grislis' and my review of my law firm's time, as presented in Plaintiff's opening brief, demonstrates that the time spent by my firm's paralegals and clerks after billing judgments is 741.3 hours, which is 1.3 hours higher than that indicated in our original chart and Exhibit 1. I do not know why Defendant Tesla asserts that Plaintiff is requesting compensation for 739.7 hours (1.6 hours less) for the work of our paralegals and clerks.

5. The revised merits lodestar for my law firm, without any multiplier enhancement, is detailed in the following chart which should be used in place of the chart that was included in ¶61 of my prior declaration and its Exhibit 1. This same information is included in the revisions to Exhibit 1 that are contained in **Exhibit 11** to this declaration.

Attorney/Staff	Hourly Rate	Hours Spent	Total
Lawrence A. Organ	\$975	2356.4	\$2,297,490
Marqui Hood	\$900	128	\$115,200
Molly Durkin	\$750	46.2	\$34,650
Cimone Nunley	\$500	1520.5	\$760,250
Navruz Avloni	\$725	449	\$325,525
Emily Kohlheim	\$425	75.4	\$32,045
Noah Baron	\$600	21	\$12,600

CCRLG Law Clerks and Paralegals	\$225	741.3	\$166,792.5
TOTAL			\$3,744,552.50

6. Attached as **Exhibit 12** is a true and correct copy of a revised spreadsheet detailing Plaintiff's counsel's time with a multiplier applied to the different time periods of the case based on the revisions to the lodestar identified in Plaintiff's reply papers. For the work on the first trial through October 5, 2021, Plaintiff seeks a 2.0 multiplier for the 3,271 hours that CCRLG timekeepers worked on this case. For the period from October 6, 2021 until February 6, 2022, Plaintiff seeks a 1.5 multiplier for the 318.9 hours (not including fees-on-fees work) that CCRLG timekeepers worked. For all subsequent time after that (except fees-on-fees work and work pertaining to the upcoming cross-appeals), Plaintiff seeks a 1.2 multiplier on the 1,486.9 hours that CCRLG timekeepers worked. Plaintiff is not seeking a multiplier on the 151 hours of CCRLG work for fees-on-fees work after the second trial.

7. Plaintiff is also not seeking additional fees-on-fees work for the time I spent analyzing and revising our calculations for the accompanying reply brief, even though additional time was clearly spent checking the work of what we originally submitted and reviewing and checking the work that Defendant Tesla submitted. I excluded this time in exercise of billing judgment from the calculations submitted to the Court because Mr. Rubin and Ms. Johnson were primarily responsible for reviewing and editing the initial draft of the reply brief, and my time would have been duplicative.

8. In many instances, it was impossible to check Tesla's calculations and time summaries because Tesla generally relies on its own summary documents (e.g., Posner Decl. Exs. A & B) but declined to submit to the Court and to Plaintiff's counsel the actual database it claims to have created based on the time runs submitted by Plaintiff's counsel.

9. In reviewing Tesla's opposition papers, I found numerous calculation errors. For example, Tesla identifies 0.2 hours for Joshua Arnold but Plaintiff is not claiming any time for Mr. Arnold. Similarly, Tesla identifies 5.1 hours for Tracy Fehr, but Plaintiff is also not claiming

any time for Ms. Fehr. Instead, Mr. Alexander exercised billing judgments and excluded time for both Mr. Arnold and Ms. Fehr. Tesla claims that Mr. Rubin's time was 495.1 hours, but his spreadsheet shows 496.6 hours, or a \$1,912.50 higher lodestar. For his partner Corrine Johnson, Tesla undercounted her time by 0.2 hours. Tesla undercounted my time by 0.1 hours. It undercounted Marqui Hood's time by 2.3 hours too low because the actual number is 128 hours, not 125.7. Tesla overstates Ms. Navruz Avloni's time by 0.3 hours. Finally, Tesla understates my firm's paralegal and law clerk time, which should be 741.3 hours, not 739.6.

DEFENDANT'S REQUESTED REDUCTIONS IN CATEGORIES OF TIME

10. Tesla's challenge to Plaintiff's counsel's 0.1 time entrees is factually inaccurate. Each of those entries reflects actual time spent on this case, many times for more than six minutes. The general practice in my firm is for timekeepers to bill 0.1 for tasks, or a related series of tasks, that alone or in combination require approximately six minutes of time. I understand this to be standard practice in the Bay Area among law firms that bill on an hourly basis, and Tesla does not dispute that its own attorneys similarly bill in this manner. Tesla's assertion that our 0.1 time entries overstate the amount of time actually spent, but that is not true. We often do not bill or record tasks that take a very small amount of time like phone messages or short emails. For those entries that are recorded as point one entries, we typically combine tasks or only record events that are distinct from other tasks we are performing. For example, Tesla points to the time spent by me and my paralegal Sabrina Grislis on March 14, 2023. But a review of Ms. Grislis's time entries for that date show that she combined several tasks into a single 0.1 entry. Her contemporaneous time records thus show that Ms. Grislis made a phone call to witness Wayne Jackson and also sent a text message to him that day, but billed only 0.1 for both activities combined. Tesla also challenges my time entries on March 14, 2023, which recorded three 0.1 entries relating to the coordination with defense counsel for the trial testimony of Michael Wheeler and Jackelin Delgado as witnesses for trial. (See **Exhibit 13** which is a true and correct copy of various emails from March 14, 2023 relating to the 0.1 time entries cited by Tesla and included in my time run reports accompanying my prior declaration.) My first 0.1 entry was an email I wrote and sent at 1:42 PM to Ms. Henderson noting the status of the two witnesses and

our inability to serve Mr. Wheeler or to compel Ms. Delgado to show up for trial and proposing that we designated their testimony. At 7:17 PM, Mr. Posner responded that Tesla had served Ms. Delgado, so no designation of her testimony was necessary. Mr. Posner proposed meeting and conferring on Mr. Wheeler's designations. At 9:13 PM, I responded to his statement about Ms. Delgado and suggested meet and confer times to discuss what to do about Mr. Wheeler's testimony. These emails and the corresponding entries show that there were three discrete discussions that were appropriately billed separately. My time entries on the days after March 14 further demonstrate my practice of combining various tasks into a single 0.1 entry where appropriate. For example, on March 15, 2023, one of my time entries for 0.1 reads: "Text exchange with Bernard re timing and strategy" and another reads "Email exchanges re MIIL rulings." On March 16, 2023, there was another combined entry of "Email exchange with Michael re preliminary jury instructions." These entries demonstrate my practice of combining multiple communications into a single time entry, which I believe refutes Tesla's false assertion that billing entries of 0.1 overstates the time spent on various tasks.

11. With respect to travel time, when an attorney from my firm has to leave the office in San Anselmo (E.g. for a deposition, a hearing, a case-related meeting, or some other case-related activity), our practice is to record the actual time that they were away from the office on the task and to include the travel time related to the activity. The reason for this was to incorporate the actual travel time necessary for a particular activity. This is why the time for such activities outside the office were not separated from the travel time associated with those activities. So, when a time entry includes travel time, that is still time actually spent on the case. In an effort to address Tesla's attack on our alleged block billing of activities that include travel time, I asked my paralegal Sabrina Grislis to review the particular activities and separate out travel time so facilitate the Court's review of these activities separately from the travel time. These calculations are attached as **Exhibit 14** to this supplemental declaration. Additionally, during the trial, Ms. Nunley had to commute from her normal workplace of Sacramento, Mr. Alexander had to travel from Los Angeles, and Mr. Rosenthal worked out of my office in San Anselmo.

1 12. Mr. Alexander and I routinely use different types of focus groups, some formal but
2 many informal, to help us strategize about case themes and to practice our opening statements
3 and closing arguments and to test the impact of demonstrative exhibits that we are considering
4 using. Over the years, my experience has shown that this practice has been a crucial tool for
5 effective trial preparation. I typically convene focus groups at different phases of a case to refine
6 the message and test various approaches, as I did in the *Diaz* case. In this case, our first focus
7 group was on August 15, 2020, when we recruited an attorney to role-play lead defense counsel
8 Tracey Kennedy and we presented both sides of the case to mock jurors to see how they would
9 react to our themes and messaging and how they would respond to Tesla's themes and
10 messaging. The lessons we learned from that experience were invaluable to us in preparing for
11 the Settlement Conference and for completing discovery. The second and third focus groups
12 were both conducted on September 5, 2021. We used these focus groups to refine our message,
13 address any concerns that might favor Tesla, and to test various demonstrative exhibits we
14 intended to use at trial. All three of these focus groups were used to get information that helped
15 our chances of victory in the first trial. We also practiced the opening statement on September
16 22, September 25, and September 26 in front of groups of people (mostly friends and colleagues,
17 who were unpaid and whose time we have not billed) immediately prior to the first trial.

18 13. Before the damages retrial, we were informed that Tesla's lead trial counsel would be
19 Alex Spiro, who was reputed never to have lost a case since leaving the District Attorney's office
20 in New York. In some ways, we were at a disadvantage in the retrial because Tesla knew how we
21 had successfully prosecuted the case and its new attorneys at Quinn Emmanuel were clearly
22 intent upon approaching the case differently than previous counsel had done, in an effort to
23 minimize or eliminate any compensatory or punitive damages. To respond to Tesla's anticipated
24 approach, my co-counsel and I concluded in the exercise of our professional judgment that
25 Plaintiff would benefit by obtaining additional guidance from focus groups about damages and
26 about how Tesla's new approach might be perceived by a damages-only jury. Accordingly, we
27 conducted 10 sessions on December 21, 2022, February 16, 2023, February 26, 2023, March 2,
28 March 4, March 13, March 18, March 21, March 25, and March 26. The first eight sessions were

1 principally designed to examine Tesla’s anticipated defenses, refine the message for retrial, and
2 determine how jurors would look at instructions from the Court and the truncated evidence we
3 had for the retrial. The last two sessions were used to practice for opening statement and test our
4 new demonstrative evidence.

5 14. With respect to the portion of five days I attended the *Littleton v. Tesla* securities trial
6 before Judge Edward Chen in January 2023, I felt this time was important to our preparation
7 because no one on our team had experience with Tesla’s lead counsel, Alex Spiro, or how he
8 approached opening statements, closing arguments, direct and cross-examination, or interactions
9 with the court. I felt it particularly important to watch portions of his voir dire, opening, cross
10 examination techniques and closing argument to get a better understanding of how we should
11 approach the *Diaz* case on retrial. Although *Littleton* was a securities class action, the plaintiffs
12 had almost won liability except for the question of “materiality,” so I felt the procedural posture
13 was similar to our damages-only retrial. The *Littleton* trial gave me insight into Tesla’s continued
14 efforts to have the Court require a retrial on some elements of liability and how Mr. Spiro would
15 approach damages.

16 15. The Court should note that the time submissions by my firm are necessarily low
17 because of a computer error when we changed billing software programs in February 2018. The
18 export of time entries from our old software from 2017 when we took Mr. Diaz’s case to
19 February 26, 2018 were lost except for four entries of 8.2 hours of time. No time was included
20 for the hours spent investigating the case, drafting the complaint, or completing the initial
21 gathering of evidence for initial disclosure. I estimate that we lost somewhere between 75 and
22 100 hours of billing based on our typical practices for taking cases. This time would be worth
23 approximately \$65,000, further establishing the reasonableness of Plaintiff’s request for fees.

24 16. My firm as expended additional time from October 7, 2023, responding to Tesla’s
25 opposition papers to our motion. This submission only includes time spent by my associate
26 Cimone Nunley who drafted the reply brief and our paralegals Sabrina Grislis and Teodora
27 Gagauz, as well as one time entry from partner Marqui Hood. In the exercise of billing judgment
28 I cut all time I personally spent assisting in the preparation of the reply brief, which amounted to

1 approximately 47 hours or \$45,825.00 worth of time cut. Attached hereto as **Exhibit 15** is a true
2 and correct copy of the time runs after I exercised billing judgments. This time amounts to
3 \$57,250.00.

4 **CASE EXPENSES**

5 17. Expert witness fees are specifically permitted to a prevailing plaintiff in a civil rights
6 action under 42 U.S.C. §1988. Attached as **Exhibit 16** is a true and correct copy of the billing
7 invoice for Dr. Bruce Smith who we used in seeking damages at the mediation of this case.
8 Unfortunately, Dr. Smith became terminally ill prior to trial, which is why we had to replace him
9 with Dr. Anthony Reading.

10 18. Attached as **Exhibit 17** is a true and correct copy of an email confirming the retainer
11 that was paid to Michael Robbins and a copy of the check and a subsequent billing invoice from
12 Michael Robbins for \$4,500. These two documents support Plaintiff's request for \$10,500 for
13 Mr. Robbins' time. Mr. Robbins is an investigations and HR practices expert. I had originally
14 retained Mr. Robbins to provide trial testimony in this matter, but when the deadline for expert
15 designations was approaching, he informed me that he would not be able to meet the deadline.
16 Accordingly, I retained another expert, Amy Oppenheimer, to produce the expert witness report
17 and testify at trial.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct based on my knowledge and belief. Executed December 4, 2023, in
20 San Anselmo, California.

21 
22 _____

23 Lawrence A. Organ
24
25
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27
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Exhibit 11

EXHIBIT 11 - REVISED BASE LODESTAR 12-04-2023

<u>REVISED</u> EXHIBIT 1: BASE LODESTAR WITHOUT MULTIPLIERS				
Attorney/Staff	Year	Rate	Hours	Lodestar
<u>Altshuler Berzon</u>				
Michael Rubin	1977	\$1275	496.6	\$633,165.00
Jonathan Rosenthal	2019	\$650	614.65	\$399,522.50
Corrine Johnson	2012	\$825	196.4	\$162,030.00
Sam Hull	2022	\$550	15.7	\$8,635.00
Altshuler Berzon Law Clerks and Paralegals	N/A	\$325/350	91.2	\$29,661.00
TOTAL AB LODESTAR				\$1,233,013.50
<u>Alexander, Morrison, & Fehr</u>				
Bernard Alexander	1986	\$1200	967.6	\$1,161,120.00
Britt Karp	2011	\$675	39	\$26,325.00
Natalie Khoury	2021	\$350	49.9	\$17,465.00
Gus Ham (Paralegal)	N/A	\$225	48.4	\$10,890.00
TOTAL AMF LODESTAR				\$1,215,800.00
<u>California Civil Rights Law Group</u>				
Lawrence Organ	1994	\$975	2356.4	\$2,297,490.00
Marqui Hood	2001	\$900	128	\$115,200.00
Molly Durkin	2006	\$750	46.2	\$34,650.00
Navruz Avloni	2011	\$725	449	\$325,525.00
Cimone Nunley	2018	\$500	1520.5	\$760,250.00
Emily Kohlheim	2021	\$425	75.4	\$32,045.00
Noah Baron	2015	\$600	21	\$12,600.00
CCRLG Law Clerks/Paralegals	N/A	\$225	741.3	\$166,792.50
TOTAL CCRLG LODESTAR				\$3,744,552.50

EXHIBIT 11 - REVISED BASE LODESTAR 12-04-2023

<u>Collier Law Firm</u>				
Dustin Collier	2009	\$750	272.93	\$204,697.50
V. Joshua Socks	2012	\$700	83.1	\$58,170.00
Drew Teti	2009	\$550	40.9	\$22,495.00
Elizabeth Malay	2013	\$400	187.4	\$74,960.00
TOTAL CLF LODESTAR				\$360,322.50

TOTAL LODESTAR OF ALL FIRMS' TIME: \$6,553,688.50

Exhibit 12

REPLY EXHIBIT 12 WHICH IS A REVISED EXHIBIT 3: BASE LODESTAR WITH MULTIPLIERS													
Biller	Hourly Rate	Hours before 10/5/21	w/2x Multiplier	Hours 10/6/21-2/6/22	Fees on Fees for 10/6/21-2/6/22	w/1.5 multiplier	Hours after 2/6/22	Fees on Fees after 2/6/22	w/1.2 multiplier	Fees-on-fees hours	Fees on Fees total w/ 0 multiplier	Total Hours	Total from Biller
Michael Rubin	\$1,275	0	\$0	114.3	5.8	\$207,506.25	382.3	4.5	\$578,034.0	10.3	\$13,132.50	496.6	\$798,672.75
Jonathan Rosenthal	\$650	0	\$0	134.85	0	\$131,478.75	479.8	0	\$374,244.0	0	\$0.00	614.65	\$505,722.75
Corinne Johnson	\$825	0	\$0	0	0	\$0.00	196.4	0.3	\$194,139.0	0.3	\$247.50	196.4	\$194,386.50
Sam Hull	\$550	0	\$0	0	0	\$0.00	15.7	0	\$10,362.0	0	\$0.00	15.7	\$10,362.00
Althshuler Berzon Clerks/Paralegals	\$325	0	\$0	6.5	0	\$3,168.75	84.7	0	\$33,033.0	0	\$0.00	91.2	\$36,201.75
Bernard Alexander	\$1,200	606.75	\$1,456,200	69.4	5.2	\$115,560.00	291.45	3.7	\$414,360.0	8.9	\$10,680.00	967.6	\$1,996,800.00
Britt Karp	\$675	25.1	\$33,885	0	0	\$0.00	13.9	2.2	\$9,477.0	2.2	\$1,485.00	39	\$44,847.00
Natalie Khoury	\$350	0	\$0	44.5	0	\$23,362.50	5.4	0	\$2,268.0	0	\$0.00	49.9	\$25,630.50
Gus Ham (Paralegal)	\$225	48.4	\$21,780	0	0	\$0.00	0	0	\$0.0	0	\$0.00	48.4	\$21,780.00
Lawrence Organ	\$975	1371.5	\$2,674,425	108.4	1.6	\$156,195.00	876.5	8.2	\$1,015,911.0	9.8	\$9,555.00	2356.4	\$3,856,086.00
Marqui Hood	\$900	0	\$0	0	0	\$0.00	128	0.8	\$137,376.0	0.8	\$720.00	128	\$138,096.00
Molly Durkin	\$750	0	\$0	0	0	\$0.00	46.2	0	\$41,580.0	0	\$0.00	46.2	\$41,580.00
Navruz Avloni	\$725	434.2	\$629,590	14	0	\$15,225.00	0	0	\$0.0	0.8	\$580.00	449	\$645,395.00
Cimone Nunley	\$500	1014.7	\$1,014,700	244.9	73.2	\$128,775.00	260.9	55.4	\$123,300.0	128.6	\$64,300.00	1520.5	\$1,331,075.00
Emily Kohlheim	\$425	19.5	\$16,575	0.3	0	\$191.25	55.6	0	\$28,356.0	0	\$0.00	75.4	\$45,122.25
Noah Baron	\$375	21	\$15,750	0	0	\$0.00	0	0	\$0.0	0	\$0.00	21	\$15,750.00
CCRLG Clerks/Paralegals	\$225	410.1	\$184,545	33.9	7.8	\$8,808.75	297.3	3.2	\$79,407.0	11	\$2,475.00	741.3	\$275,235.75
Dustin Collier	\$750	0	\$0	0	0	\$0.00	272.93	0.3	\$245,367.0	0.3	\$225.00	272.93	\$245,592.00
V. Joshua Socks	\$700	0	\$0	0	0	\$0.00	83.1	0	\$69,804.0	0	\$0.00	83.1	\$69,804.00
Drew Teti	\$550	0	\$0	0	0	\$0.00	40.9	0	\$26,994.0	0	\$0.00	40.9	\$26,994.00
Elizabeth Malay	\$400	0	\$0	0	0	\$0.00	187.4	0	\$89,952.0	0	\$0.00	187.4	\$89,952.00
TOTAL HOURS		3951.25		771.05	93.6		3718.5	78.6			\$103,400.00	8441.58	
TOTAL			\$6,047,450			\$790,271.25			\$3,473,964.0				TOTAL
									Total fees on fees hours	173	Total fees on fees \$	\$103,400.00	\$10,415,085.25

Exhibit 13



Larry Organ <larryaorgan@gmail.com>

Michael Wheeler and Jackelin Delgado

7 messages

Larry Organ <larryaorgan@gmail.com>

Tue, Mar 14, 2023 at 1:42 PM

To: Mari Henderson <marihenderson@quinnemanuel.com>, Dan Posner <danposner@quinnemanuel.com>, Asher Griffin <ashergriffin@quinnemanuel.com>

Cc: "J. Bernard Alexander, III" <balexander@amflp.com>, Cimone Nunley <cimone@civilrightsca.com>, Marqui Hood <marqui@civilrightsca.com>, Dustin Collier <dcollier@collierlawsf.com>, Sabrina Grislis <sabrina@civilrightsca.com>, Jono Rosenthal <jrosenthal@altshulerberzon.com>

Mari,

We have been unsuccessful in serving Michael Wheeler and propose designating his trial/deposition testimony as a substitute. I would propose that we designate his testimony no later than Thursday and that you would provide any objections or counter-designations by Monday, March 20. If we had objections, we would provide those by Tuesday March 21. The parties could then submit the proposed joint designations to the Court for consideration rulings so that we can have the video/trial designations ready for the start of the trial. Please let us know your position on this proposal.

In addition, we have learned that Jackelin Delgado is no longer available for testifying as she lives outside the 150 mile limit because our information shows she lives in LA. We therefore propose designating her trial testimony for reading at the trial. I would propose that we follow the same schedule outlined above. Please let us know your position on this proposal.

Sincerely,

Larry

Lawrence A. Organ**Pronouns: He/Him/His****CALIFORNIA CIVIL RIGHTS LAW GROUP****332 San Anselmo Avenue****San Anselmo, CA 94960****(415)453-4740 phone****(415)785-7352 fax****www.civilrightsca.com****Dan Posner** <danposner@quinnemanuel.com>

Tue, Mar 14, 2023 at 7:17 PM

To: Larry Organ <larryaorgan@gmail.com>, Mari Henderson <marihenderson@quinnemanuel.com>, Asher Griffin <ashergriffin@quinnemanuel.com>

Cc: "J. Bernard Alexander, III" <balexander@amflp.com>, Cimone Nunley <cimone@civilrightsca.com>, Marqui Hood <marqui@civilrightsca.com>, Dustin Collier <dcollier@collierlawsf.com>, Sabrina Grislis <sabrina@civilrightsca.com>, Jono Rosenthal <jrosenthal@altshulerberzon.com>, Diaz-Tesla-QE <diaz-tesla-qe@quinnemanuel.com>

Larry,

We have served Ms. Delgado with a trial subpoena so no need to designate her testimony.

As for Mr. Wheeler, we would like to meet and confer regarding your proposal to offer his testimony through designations of his prior trial/deposition testimony. Are you available tomorrow or Thursday afternoon at 4 pm?

Thank you,

Dan

From: Larry Organ <larryaorgan@gmail.com>
Sent: Tuesday, March 14, 2023 1:42 PM
To: Mari Henderson <marihenderson@quinnemanuel.com>; Dan Posner <danposner@quinnemanuel.com>; Asher Griffin <ashergriffin@quinnemanuel.com>
Cc: J. Bernard Alexander, III <balexander@amflp.com>; Cimone Nunley <cimone@civilrightsca.com>; Marqui Hood <marqui@civilrightsca.com>; Dustin Collier <dcollier@collierlawsf.com>; Sabrina Grislis <sabrina@civilrightsca.com>; Jono Rosenthal <jrosenthal@altshulerberzon.com>
Subject: Michael Wheeler and Jackelin Delgado

[EXTERNAL EMAIL from larryaorgan@gmail.com]

Mari,

[Quoted text hidden]

Larry Organ <larryaorgan@gmail.com> Tue, Mar 14, 2023 at 9:13 PM
To: Dan Posner <danposner@quinnemanuel.com>
Cc: Mari Henderson <marihenderson@quinnemanuel.com>, Asher Griffin <ashergriffin@quinnemanuel.com>, "J. Bernard Alexander, III" <balexander@amflp.com>, Cimone Nunley <cimone@civilrightsca.com>, Marqui Hood <marqui@civilrightsca.com>, Dustin Collier <dcollier@collierlawsf.com>, Sabrina Grislis <sabrina@civilrightsca.com>, Jono Rosenthal <jrosenthal@altshulerberzon.com>

Dan,

With respect to Delgado, that is great news. I assume you will work with us in coordinating her testimony.

With respect to Wheeler, I am available tomorrow at 5:00 or Thursday at 4:00. Let me know what works for you.

Larry

Lawrence A. Organ
Pronouns: He/Him/His
CALIFORNIA CIVIL RIGHTS LAW GROUP
332 San Anselmo Avenue
San Anselmo, CA 94960
(415)453-4740 phone
(415)785-7352 fax
www.civilrightsca.com

[Quoted text hidden]

Dan Posner <danposner@quinnemanuel.com> Wed, Mar 15, 2023 at 11:01 AM
To: Larry Organ <larryaorgan@gmail.com>
Cc: Mari Henderson <marihenderson@quinnemanuel.com>, Asher Griffin <ashergriffin@quinnemanuel.com>, "J. Bernard Alexander, III" <balexander@amflp.com>, Cimone Nunley <cimone@civilrightsca.com>, Marqui Hood <marqui@civilrightsca.com>, Dustin Collier <dcollier@collierlawsf.com>, Sabrina Grislis <sabrina@civilrightsca.com>, Jono Rosenthal <jrosenthal@altshulerberzon.com>, Diaz-Tesla-QE <diaz-tesla-qe@quinnemanuel.com>

Hi Larry, let's do 4 p.m. tomorrow. I'll send a link.

Thanks,

[Quoted text hidden]

Dan Posner <danposner@quinnemanuel.com>
To: Larry Organ <larryaorgan@gmail.com>

Wed, Mar 15, 2023 at 11:02 AM

I sent link to you and Cimone but feel free to forward to others if you want them to join.

[Quoted text hidden]

Dustin Collier <dcollier@collierlawsf.com>

Sun, Mar 19, 2023 at 2:08 PM

To: Dan Posner <danposner@quinnemanuel.com>, Larry Organ <larryaorgan@gmail.com>, Mari Henderson <marihenderson@quinnemanuel.com>, Asher Griffin <ashergriffin@quinnemanuel.com>
Cc: "J. Bernard Alexander, III" <balexander@amflp.com>, Cimone Nunley <cimone@civilrightsca.com>, Marqui Hood <marqui@civilrightsca.com>, Sabrina Grislis <sabrina@civilrightsca.com>, Jono Rosenthal <jrosenthal@altshulerberzon.com>, Diaz-Tesla-QE <diaz-tesla-qe@quinnemanuel.com>

Counsel,

We've been able to secure Wheeler's cooperation with service, so we will no longer need to designate testimony for him as an unavailable witness.

Best,

--

Dustin L. Collier

Collier Law Firm, LLP

240 Tamal Vista Blvd., Ste. 100

Corte Madera, CA 94925

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F: (415) 767-0037

www.collierlawsf.com



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CIRCULAR 230 DISCLOSURE:

To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that, unless expressly stated otherwise, any federal tax advice or analysis contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties imposed under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication.

[Quoted text hidden]

Dustin Collier <dcollier@collierlawsf.com>

Tue, Mar 21, 2023 at 5:12 PM

To: Dan Posner <danposner@quinnemanuel.com>, Larry Organ <larryaorgan@gmail.com>, Mari Henderson

<marihenderson@quinnemanuel.com>, Asher Griffin <ashergriffin@quinnemanuel.com>

Cc: "J. Bernard Alexander, III" <balexander@amflp.com>, Cimone Nunley <cimone@civilrightsca.com>, Marqui Hood

<marqui@civilrightsca.com>, Sabrina Grislis <sabrina@civilrightsca.com>, Jono Rosenthal

<jrosenthal@altshulerberzon.com>, Diaz-Tesla-QE <diaz-tesla-qe@quinnemanuel.com>

Counsel,

What time do you want to do the mutual exchange of opening demonstratives tomorrow?

We would propose 6 p.m., if that works for you all.

Best,

--

Dustin L. Collier

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240 Tamal Vista Blvd., Ste. 100

Corte Madera, CA 94925

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F: (415) 767-0037



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CIRCULAR 230 DISCLOSURE:

To ensure compliance with requirements imposed by the Internal Revenue Service, we inform you that, unless expressly stated otherwise, any federal tax advice or analysis contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties imposed under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this communication.

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Exhibit 14

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
9/21/2017	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Travel to Oakland office to meet with Owen Diaz
9/21/2017	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	4.0	\$3,900.00	Meet with Owen in Oakland office
9/21/2017	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Return to San Anselmo from meeting with Owen Diaz in Oakland office
2/27/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Travel to San Francisco courthouse for CMC appearance
2/27/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.3	\$292.50	Appear at the Case Management Conference before Judge Orrick
2/27/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Travel back to San Anselmo office after CMC at San Francisco courthouse.
3/18/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.5	\$487.50	Travel to Oakland office to meet with Owen Diaz
3/18/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	2.5	\$2,437.50	Meet with Owen Diaz in Oakland
3/18/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.5	\$487.50	Return to San Anselmo from meeting with Owen Diaz in Oakland office
5/15/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.7	\$1,657.50	Travel to San Francisco from San Anselmo for the deposition of Demetric Di-az
5/15/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	7.0	\$6,825.00	Appear for the deposition of Demetric Diaz taken by Barbara Antonucci for 5.0 hours of recorded testimony. Spend time with client in relating to deposition.
5/15/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.8	\$1,755.00	Return to San Anselmo from San Francisco from the deposition of Demetric Di-az
5/15/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Travel to the deposition of Demetric Di-az
5/15/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	7.0	\$5,075.00	Attend deposition of Demetric Di-az
5/15/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Travel from the deposition of Demetric Di-az
5/22/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Travel to San Francisco for the deposition of Owen Diaz
5/22/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	7.2	\$7,020.00	Appear for deposition of Owen Diaz with Navruz Avloni
5/22/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.5	\$1,462.50	Travel back to San Anselmo office after deposition of Owen Diaz
5/22/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.4	\$290.00	Travel to the deposition of Owen Diaz
5/22/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	7.2	\$5,220.00	Attended the deposition of Plaintiff Owen Diaz with Larry Organ,

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
5/22/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.4	\$290.00	Travel home from the deposition of Owen Diaz
6/11/2018	California Civil Rights Law Group	Ramzi Nimr	Law Clerk	\$ 225.00	0.8	\$180.00	Travel to the mediation in San Francisco
6/11/2018	California Civil Rights Law Group	Ramzi Nimr	Law Clerk	\$ 225.00	6.0	\$1,350.00	Appear at mediation with Mary Leichliter
6/11/2018	California Civil Rights Law Group	Ramzi Nimr	Law Clerk	\$ 225.00	0.7	\$157.50	Travel home from the mediation in San Francisco
6/11/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to the mediation in San Francisco
6/11/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	6.0	\$5,850.00	Appear with Nav Avloni, Clients and Ramzi Nimr for mediation with Mary Leichliter
6/11/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.4	\$1,365.00	Travel to the mediation in San Francisco
6/11/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.3	\$217.50	Travel to the mediation in San Francisco
6/11/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	6.0	\$4,350.00	Appear at mediation with Mary Leichliter
6/11/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.2	\$145.00	Travel to the mediation in San Francisco
9/4/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Travel to courthouse for Case Management Hearing
9/4/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.3	\$217.50	Appear at Case Management Hearing in San Francisco.
9/4/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.4	\$290.00	Travel home from courthouse for Case Management Hearing
10/16/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to Oakland for the mediation with Jeff Ross
10/16/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	6.5	\$6,337.50	Appear for mediation with Jeff Ross -- Ramzi also attended -- We communicated offers to Mediator. No offers from Defense.
10/16/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel back to San Anselmo from Oakland for mediation
12/3/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.5	\$1,462.50	Travel to San Francisco for deposition of Owen Diaz
12/3/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	3.2	\$3,120.00	Appear for Day 2 of Owen Diaz; deposition went over time; permitted counsel for Tesla Barbara Antonucci and counsel for West Valley Fenn Horton to ask questions after time had expired
12/3/2018	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.5	\$1,462.50	Travel back to San Anselmo from the deposition of Owen Diaz

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
12/4/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.6	\$435.00	Travel to location for Demetric Di-az's deposition
12/4/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.5	\$1,087.50	Defended client Demetric Di-az's deposition
12/4/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.6	\$435.00	Return from the deposition of Demetric Di-az
12/6/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.9	\$652.50	Travel to Oakland for the deposition of Monica DeLeon
12/6/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	7.5	\$5,437.50	Took the deposition of Monica DeLeon
12/6/2018	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.9	\$652.50	Travel from the Oakland office after the deposition of Monica DeLeon
5/17/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Traveled to Oakland for the deposition of Wayne Jackson
5/17/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	3.7	\$3,607.50	Deposition of Wayne Jackson and travel to and from Oakland
5/17/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.8	\$780.00	Return to office from Oakland
5/20/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.8	\$780.00	Travel to Oakland for the deposition of Tom Kawasaki
5/20/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.8	\$780.00	Appear for Depo of Tom Kawasaki (no show)
5/20/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Travel back from Oakland from Tom Kawasaki deposition (no show)
5/20/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.2	\$145.00	Travel to meet with Demetica and LaDrea for depo prep
5/20/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	2.0	\$1,450.00	Met with Demetrica and LaDrea re depo prep
5/20/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.3	\$217.50	Return from meeting with LaDrea and Demetrica for depo prep
5/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.5	\$1,087.50	Travel to the deposition of Demetrica Holmes in San Jose
5/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	7.0	\$5,075.00	Deposition of Demetrica Holmes
5/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.6	\$1,160.00	Return from the deposition of Demetrica Holmes in San Jose
5/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.3	\$217.50	Meeting with Demetrica Holmes re deposition
6/6/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.3	\$1,267.50	Travel to the Oakland office for the Cititstaff PMK deposition

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
6/6/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.3	\$5,167.50	Appear for Citistaff PMK depo in Oakland
6/6/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Return from the Citistaff PMK deposition at the Oakland office
6/12/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Travel to the Oakland office for the deposition of Michael Wheeler
6/12/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	3.0	\$2,925.00	Appear for deposition of Michael Wheeler in Oakland
6/12/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.3	\$1,267.50	Return from Michael Wheeler's depostion at the Oakland office
6/17/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Travel to the Oakland office for the nextSource PMK deposition
6/17/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	8.3	\$8,092.50	Appear for nextSource PMK deposition
6/17/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from the nextSource PMK deposition at the Oakland office
6/17/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Prep for meeting with Titus McCaleb.
6/17/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	2.7	\$1,957.50	Meeting with titus mccaleb
6/17/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.6	\$435.00	Travel to Oakland office to meet with Titus McCaleb
6/17/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.6	\$435.00	Return from Oakland office meeting with Titus McCaleb
6/18/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.5	\$1,087.50	Travel toTitus McCaleb's deposition in San Jose
6/18/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	6.0	\$4,350.00	Appeared for Titus McCaleb's deposition
6/18/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.0	\$725.00	Meeting with Owen Diaz
6/18/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.5	\$1,087.50	Return from Titus McCaleb's deposition in San Jose
6/20/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.5	\$1,087.50	Travel to LaDrea Jones deposition
6/20/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	2.0	\$1,450.00	Appear for LaDrea Jones deposition
6/20/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.0	\$725.00	Meeting with client
6/20/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.5	\$1,087.50	Return from LaDrea Jones' deposition

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
6/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Travel to the deposition of Owen Diaz
6/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Discussion with Owen Diaz about deposition prep
6/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	4.0	\$2,900.00	Appeared for Owen Diaz depo
6/21/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Return from the deposition of Owen Diaz
7/26/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.8	\$580.00	Travel to the deposition of Lamar Patterson
7/26/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	4.0	\$2,900.00	Appeared for the deposition of Lamar Patterson
7/26/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.7	\$507.50	Return from the deposition of Lamar Patterson
9/9/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.6	\$435.00	Travel to Fisher Phillips office for meet and confer with all opposing counsel.
9/9/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Return from Fisher Phillips office from meet and confer with all opposing counsel re pmk topics, number of depositions, stipulation re msg briefing schedule
9/10/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.0	\$725.00	Travel to San Francisco for CMC
9/10/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Attend CMC
9/10/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.1	\$797.50	Return to San Anselmo from CMC
9/10/2019	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Travel to San Francisco for CMC
9/10/2019	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	0.5	\$250.00	Attend CMC
9/10/2019	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.1	\$550.00	Return to San Anselmo from CMC
9/10/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to San Francisco for CMC
9/10/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.5	\$487.50	Appear for CMC before Judge Orrick with Cimone Nunley and Navruz Avloni; serve RPD Set 8 on Tesla (in person at hearing)
9/10/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Return to San Anselmo from CMC
9/13/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.7	\$507.50	Travel to meeting with counsel for Tesla

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
9/13/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.3	\$942.50	Met with Tesla opposing counsel re pmk topics, depositions, scheduling, plaintiffs' disc responses
9/13/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.7	\$507.50	Return from meeting with counsel for Tesla
10/9/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Travel to Oakland for the deposition of Tom Kawasaki
10/9/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	2.0	\$1,950.00	Deposition of Tom Kawasaki; trial subpoena issued
10/9/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Return from Oakland office for Tom Kawasaki deposition
10/14/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.7	\$507.50	Travel to meeting with Patricia Jeng for Tesla
10/14/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.7	\$507.50	Met and conferred in person with Tesla counsel Patricia Jeng re tesla discovery responses.
10/14/2019	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.8	\$580.00	Return from meeting with Patricia Jeng
10/15/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to the deposition of Veronica Martinez in Oakland
10/15/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	3.1	\$3,022.50	Appear for Deposition of Veronica Martinez
10/15/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.4	\$1,365.00	Return from Veronica Martinez's deposition in Oakland
10/21/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.9	\$5,752.50	Travel from San Anselmo to Los Angeles for the deposition of Erin Marconi
10/21/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	4.8	\$4,680.00	Appear for deposition of Erin Marconi (Bernard had trial conflict)
10/21/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	6.0	\$5,850.00	Return to San Anselmo from Los Angeles from Erin Marconi deposition
10/24/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	2.4	\$2,340.00	Travel to Palo Alto for Andres Donet deposition
10/24/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Appear for Deposition of Andres Donet.
10/24/2019	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	2.5	\$2,437.50	Return from Palo Alto for Andres Donet deposition
12/17/2019	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	3.0	\$3,600.00	Preparation for the MSJ Hearing
12/17/2019	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	1.0	\$1,200.00	Attend MSJ Hearing
12/17/2019	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	2.5	\$3,000.00	Travel back to LAX from MSJ Hearing in San Francisco

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12/17/2019	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	3.1	\$1,550.00	Travel to MSJ hearing from Sacramento for all defendants
12/17/2019	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Travel from MSJ for all Defendants hearing to San Anselmo office
2/25/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Travel To San Francisco for Charles Mahla deposition
2/25/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.7	\$1,657.50	Appear for deposition of Charles Mahla
2/25/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Return from Charles Mahla deposition in San Francisco
3/7/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.8	\$780.00	Travel to Berkeley to meet with Amy Oppenheimer
3/7/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Meet with Amy Oppenheimer in Berkeley
3/7/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.7	\$682.50	Return from meeting with Amy Oppenheimer in Berkeley
3/9/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Travel to San Francisco for the deposition of Amy Oppenheimer
3/9/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	7.0	\$6,825.00	Appear for the deposition of Expert Amy Oppenheimer
3/9/2020	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return to San Anselmo from Amy Oppenheimer deposition
9/23/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	0.9	\$450.00	Drop off supplies, test technology hookups, and arrange counsel table at CA Northern District courthouse
9/23/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	0.6	\$135.00	Travel to the Northern District courthouse
9/23/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.6	\$585.00	Travel to San Francisco courthouse
9/23/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Drop off supplies and test technology at the Northern District Courthouse.
9/23/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.8	\$780.00	Travel back to San Anslemo from Northern District courthouse
9/24/2021	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	1.5	\$1,800.00	Pre-trial meeting with jury consultant, preparation for voir dire, travel to court
9/24/2021	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	5.0	\$6,000.00	Appearance at court, pre-trial conferences with court, jury selection
9/24/2021	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	7.0	\$8,400.00	Post-trial preparation for trial
9/24/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.9	\$427.50	Travel to courthouse.

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9/24/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.0	\$1,125.00	Appear for trial: jury selection.
9/24/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.1	\$247.50	Return to San Anselmo from courthouse
9/24/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.1	\$550.00	Travel to courthouse
9/24/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.0	\$2,500.00	attend jury selection conference
9/24/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.1	\$550.00	Return to San Anselmo from courthouse
9/24/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.9	\$652.50	Travel to courthouse
9/24/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	5.0	\$3,625.00	Appear for voir dire
9/24/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.1	\$797.50	Return to San Anselmo from courthouse
9/24/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Travel to courthouse
9/24/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.0	\$4,875.00	Appear at Jury Selection
9/24/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Return to San Anselmo from courthouse
9/27/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.5	\$337.50	Travel to courthouse.
9/27/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.5	\$1,237.50	Appear at trial, day 1.
9/27/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse
9/27/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.1	\$550.00	Travel to courthouse.
9/27/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.5	\$2,750.00	Appear for trial day 1.
9/27/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Return from courthouse
9/27/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Travel to courthouse.
9/27/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	5.0	\$3,625.00	Diaz Trial - Day 1; appear
9/27/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.0	\$725.00	Return from courthouse

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9/27/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Travel to courthouse.
9/27/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.5	\$5,362.50	Attend Day 2 of Court - Opening statements, Tom Kawasaki Direct and Cross, Ed Romero Direct
9/27/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
9/28/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.4	\$315.00	Travel to courthouse.
9/28/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.6	\$1,260.00	Appear at trial, day 2.
9/28/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse
9/28/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Travel to courthouse.
9/28/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.6	\$2,800.00	Appear at trial at CAND courthouse;
9/28/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Return from courthouse
9/28/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Travel to courthouse.
9/28/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	5.0	\$3,625.00	Appeared in court
9/28/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	1.0	\$725.00	Return from courthouse
9/28/2021	California Civil Rights Law Group	Teodora Gagauz	Paralegal	\$ 225.00	1.0	\$225.00	Travel to courthouse.
9/28/2021	California Civil Rights Law Group	Teodora Gagauz	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse
9/28/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
9/28/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.6	\$5,460.00	Appear for Day 3 of trial -- Ed Romero Cross, Redirect -- Wayne Jackson, Jackelin Delgado, Victor Quintero -- court received 106 with limiting instruction refused Ex. 109
9/28/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
9/29/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.5	\$337.50	Travel to courthouse.
9/29/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.5	\$1,237.50	Appear at trial, day 3
9/29/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse

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9/29/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Travel to courthouse.
9/29/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.5	\$2,750.00	Appear for day 3 of trial
9/29/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Return from courthouse
9/29/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
9/29/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.5	\$5,362.50	Appear for Day 4 of Trial -- Video of Kevin McGinn, Video of Demetric Diaz, Owen Diaz Testimony (LO) - interrupt with Michael Wheeler (Bernard), finish Owen Direct (LO), Owen cross begins
9/29/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
9/30/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	2.3	\$517.50	Travel to courthouse.
9/30/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.3	\$1,192.50	Appear at trial, day 4.
9/30/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	0.9	\$202.50	Return from courthouse
9/30/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	0.8	\$400.00	Travel to courthouse.
9/30/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.3	\$2,650.00	Attend day 4 of trial
9/30/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	0.9	\$450.00	Return from courthouse
9/30/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse. (Note protest on Golden Gate Bridge)
9/30/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.3	\$5,167.50	appear for Day 5 of Trial -- Owen Diaz cross and redirect(me), Anthony Reading (Bernard), LaDrea Jones (Cimone), Play Marconi, Amy Oppenheimer (me), Dr. Charles Mahla (LO) - read discovery, admit exhibits 3, 6, 389, Adjourn
9/30/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Return from courthouse
10/1/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.8	\$405.00	Travel to courthouse.
10/1/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	4.6	\$1,035.00	Appear at trial, day 5.
10/1/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.1	\$247.50	Return from courthouse

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10/1/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.2	\$600.00	Travel to courthouse.
10/1/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	4.6	\$2,300.00	Appear for closing arguments and instructions conference
10/1/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Return from courthouse
10/4/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Travel to courthouse.
10/4/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	8.7	\$4,350.00	Appear at trial, final day. Argued exhibits with counsel for Defendant. Waited for verdict; returned for jury's questions; heard verdict.
10/4/2021	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Return from courthouse
10/4/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	0.7	\$157.50	Travel to courthouse.
10/4/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	8.7	\$1,957.50	Appear at trial, day 6. Wait for jury's verdict.
10/4/2021	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	0.6	\$135.00	Return from courthouse
10/4/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Travel to courthouse.
10/4/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	5.5	\$3,987.50	Appeared in court for closing and voir dire; assisted with pickup, etc.
10/4/2021	California Civil Rights Law Group	Navruz Avloni	Attorney (Partner)	\$ 725.00	0.5	\$362.50	Return from courthouse
10/4/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
10/4/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	8.7	\$8,482.50	Attend Day 7 of trial - Closing arguments and Jury Deliberation - 3.5 hours of deliberations - Verdict of \$6.9 million in compensatory damages and \$130 million in punis.
10/4/2021	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
1/12/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
1/12/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	2.9	\$2,827.50	Attend MSC with Judge Illman and Owen Diaz - Dan Posner was there -- they indicated their goal was \$0 recovery-- and travel time to and from San Francisco
1/12/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse

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1/17/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
1/17/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	4.7	\$4,582.50	Attend Littleton v. Musk trial Day 1 (voir dire) to get an understanding of how Alex Spiro tries cases
1/17/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
1/18/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
1/18/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	2.8	\$2,730.00	Attend Littleton Trial for opening statements by Alex Spiro
1/18/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
1/23/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
1/23/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.8	\$5,655.00	Attend in Littleton case researching Alex Spiro
1/23/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
1/27/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
1/27/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.7	\$5,557.50	Attend Littleton trial to observe opposing counsel in trial
1/27/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
2/1/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
2/1/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	4.7	\$4,582.50	Attend In Re Tesla Trial to observe Opposing Counsel strategy
2/1/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
2/3/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
2/3/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	4.8	\$4,680.00	Observe closing arguments in Littleton case
2/3/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
2/27/2023	Altshuler Berson	Michael Rubin	Attorney (Partner)	\$ 1,275.00	0.5	\$637.50	Travel to courthouse
2/27/2023	Altshuler Berson	Michael Rubin	Attorney (Partner)	\$ 1,275.00	2.6	\$3,315.00	Prepare for pretrial conference

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2/27/2023	Altshuler Berson	Michael Rubin	Attorney (Partner)	\$ 1,275.00	1.5	\$1,912.50	Appear for oral argument re: MILs, instructions, etc., strategy
2/27/2023	Altshuler Berson	Michael Rubin	Attorney (Partner)	\$ 1,275.00	0.8	\$1,020.00	Return from courthouse
2/27/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.9	\$950.00	Travel to courthouse from Sacramento
2/27/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.5	\$750.00	attend pretrial conference; travel to/from
2/27/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	0.5	\$250.00	Return to San Anselmo office from courthouse
3/15/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Travel to Oakland to meet Tom Kawasaki
3/15/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	2.0	\$1,950.00	Meet with Tom Kawasaki re testimony and travel to and from Oakland
3/15/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.9	\$877.50	Return to San Anselmo from Oakland meeting
3/20/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.7	\$1,657.50	Travel to Fremont to meet with Michael Wheeler
3/20/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.5	\$1,462.50	Meet with Michael Wheeler and Dustin Collier in Fremont
3/20/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.5	\$1,462.50	Return to San Anselmo from meeting in Fremont
3/23/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	0.3	\$360.00	Review emails from jury consultant re for cause challenge
3/23/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	1.5	\$1,800.00	Revise Jackson testimony based on interview
3/23/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	3.0	\$3,600.00	Continue preparation for opening
3/23/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	0.3	\$360.00	Review email exchanges weigh defendant re trial exhibits
3/23/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	3.0	\$3,600.00	Review of closing by Spiro in "Funding secured" case during travel to Los Angeles
3/23/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to meet with Tom Kawasaki in Oakland office
3/23/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Meet with Tom Kawasaki in Oakland Office and travel to and from Oakland
3/23/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from Oakland meeting with Tom Kawasaki
3/24/2023	California Civil Rights Law Group	Cameron Hartquist	Paralegal	\$ 225.00	1.0	\$225.00	Travel to courthouse.

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
3/24/2023	California Civil Rights Law Group	Cameron Hartquist	Paralegal	\$ 225.00	2.1	\$472.50	Deliver trial equipment and exhibits at courthouse
3/24/2023	California Civil Rights Law Group	Cameron Hartquist	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse
3/24/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	2.1	\$472.50	Set up supplies in courtroom and test the technology;
3/24/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return to office.
3/27/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel to court;
3/27/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.8	\$520.00	Travel to co-counsel offices;
3/27/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.3	\$195.00	Travel home;
3/27/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	2.0	\$1,000.00	Travel to courthouse.
3/27/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	8.2	\$4,100.00	Attend first day of trial
3/27/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.5	\$750.00	Return from courthouse
3/27/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	2.0	\$450.00	Travel to courthouse.
3/27/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	8.2	\$1,845.00	Attend day one of trial.
3/27/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.3	\$292.50	Return from courthouse
3/28/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel to court;
3/28/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.8	\$520.00	Travel to co-counsel's offices;
3/28/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.3	\$195.00	Travel home;
3/28/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	2.0	\$1,000.00	Travel to courthouse.
3/28/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.7	\$2,850.00	Attend day 2 of trial

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
3/28/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Return from courthouse
3/28/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.8	\$405.00	Travel to courthouse.
3/28/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.7	\$1,282.50	Attend trial.
3/28/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse
3/28/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.
3/28/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.7	\$5,557.50	Trial Day 2 - Tom Kawasaki, Michael Wheeler, Wayne Jackson, Amy Oppenheimer Direct
3/28/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
3/29/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel to court;
3/29/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.8	\$520.00	Travel to co-counsel's offices;
3/29/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.3	\$195.00	Travel home;
3/29/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.6	\$360.00	Travel to courthouse.
3/29/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.8	\$1,305.00	Attend trial
3/29/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse
3/29/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.2	\$1,170.00	Travel to courthouse.
3/29/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.8	\$5,655.00	Appear for Day 3 - Oppenheimer cross, Ed Romero cross, Marconi video, Ramon Martinez Direct (no cross by Tesla), Owen Direct, Cross started
3/29/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
3/30/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel to court;
3/30/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel home;

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
3/30/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.8	\$405.00	Travel to courthouse.
3/30/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.4	\$1,215.00	Attend trial
3/30/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.5	\$337.50	Return from courthouse, pick up lunch along the way
3/30/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.6	\$800.00	Travel to courthouse.
3/30/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.4	\$2,700.00	Attend Day 4 of trial
3/30/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Return from courthouse
3/30/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.1	\$1,072.50	Travel to courthouse.
3/30/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.4	\$5,265.00	Appear for Day 4 of trial - Owen Cross & Redirect, Dr. Reading, Demetric, LaDrea
3/30/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse
3/31/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel to court;
3/31/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel home from court;
3/31/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.0	\$500.00	Travel to courthouse.
3/31/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	7.5	\$3,750.00	Attend 5th day of trial
3/31/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	1.5	\$750.00	Packed up materials from courthouse to take back to office
3/31/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	3.6	\$1,800.00	Return to Sacramento from courthouse
3/31/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.4	\$315.00	Travel to courthouse.
3/31/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	7.5	\$1,687.50	Travel to San Francisco for trial
3/31/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.5	\$337.50	Packed up materials from courthouse to take back to office
3/31/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return home from courthouse
3/31/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Travel to courthouse.

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
3/31/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	7.5	\$7,312.50	Appear for Day 5 of trial - Mahla, discovery, plaintiff rests, Jackie Delgado, Joyce DelaGrande - lunch - closing arguments - jury deliberations
3/31/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.5	\$1,462.50	Packed up materials from courthouse to take back to office
3/31/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.4	\$1,365.00	Return to office from courthouse
4/3/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	1.0	\$1,200.00	Travel to courthouse.
4/3/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	0.8	\$960.00	Debriefed outside of courtroom and waited for jurors to leave (they took other exit and we didn't see them)
4/3/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	5.3	\$6,360.00	Appearance at trial, wait for jury; receive verdict
4/3/2023	Alexander Morrison & Fehr	J. Bernard Alexander	Attorney (Partner)	\$ 1,200.00	0.9	\$1,080.00	Return from courthouse
4/3/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel to court
4/3/2023	Altshuler Berson	Jonathan Rosenthal	Attorney (Associate)	\$ 650.00	0.5	\$325.00	Travel home from court;
4/3/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	2.3	\$1,150.00	Travel to courthouse.
4/3/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	5.3	\$2,650.00	attend day 6 of trial
4/3/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	0.8	\$400.00	Debriefed outside of courtroom and waited for jurors to leave (they took other exit and we didn't see them)
4/3/2023	California Civil Rights Law Group	Cimone Nunley	Attorney (Associate)	\$ 500.00	2.3	\$1,150.00	Return from courthouse
4/3/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	0.4	\$90.00	Travel to courthouse via BART
4/3/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	5.3	\$1,192.50	Wait for jury to finish deliberating and hear verdict
4/3/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	0.8	\$180.00	Debriefed outside of courtroom and waited for jurors to leave (they took other exit and we didn't see them)
4/3/2023	California Civil Rights Law Group	Sabrina Grislis	Paralegal	\$ 225.00	1.0	\$225.00	Return from courthouse
4/3/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.3	\$1,267.50	Travel to courthouse.
4/3/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	5.3	\$5,167.50	Appear for Jury Deliberations.

<u>Date</u>	<u>Law Firm</u>	<u>Name of Biller</u>	<u>Position</u>	<u>Billing Rate</u>	<u>Time Billed</u>	<u>Fees Billed</u>	<u>Description</u>
4/3/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	0.8	\$780.00	Debriefed outside of courtroom and waited for jurors to leave (they took other exit and we didn't see them)
4/3/2023	California Civil Rights Law Group	Lawrence Organ	Attorney (Partner)	\$ 975.00	1.0	\$975.00	Return from courthouse

Exhibit 15

Date	User	Activity	Rate/Cost	Duration	Total	Description
10/24/2023	Teodora Gagauz	Review/ Analyze	\$225.00	1.9	\$427.50	reviewed all the time entries for the formatting issues and noted them for further updating it
10/25/2023	Teodora Gagauz	Paralegal	\$225.00	2.1	\$472.50	corrected the formatting on the excel sheet and PDF for the entire team's time entries and sent it to Sabrina Grislis
10/25/2023	Teodora Gagauz	Review/ Analyze	\$225.00	1.1	\$247.50	reviewed the multiplier formulas in Excel for accuracy
10/11/2023	Sabrina Grislis	Communication	\$225.00	0.2	\$45.00	Call to Oppenheimer Investigations Group about invoices
10/11/2023	Sabrina Grislis	Communication	\$225.00	0.2	\$45.00	Email to Cameron Hartquist requesting receipts
10/11/2023	Sabrina Grislis	Paralegal	\$225.00	2.8	\$630.00	Review Ink bill, email for missing costs related to parking, meals, etc
10/12/2023	Sabrina Grislis	Paralegal	\$225.00	0.1	\$22.50	Prepare Zoom link for M&C with opposing counsel
10/12/2023	Sabrina Grislis	Review/ Analyze	\$225.00	2.5	\$562.50	Review time entries
10/18/2023	Sabrina Grislis	Review/ Analyze	\$225.00	3.2	\$720.00	Review expenses and compare to costs already claimed in bill of costs
10/23/2023	Sabrina Grislis	Draft/ Revise	\$225.00	6	\$1,350.00	Revise time entries per Larry Organ's feedback and notes
10/23/2023	Sabrina Grislis	Communication	\$225.00	0.1	\$22.50	Text to Cimone Nunley confirming that I am updating time entires per Larry Organ's feedback
10/24/2023	Sabrina Grislis	Paralegal	\$225.00	3.5	\$787.50	Revise time entries; revise formatting for filing purposes.
10/24/2023	Sabrina Grislis	Review/ Analyze	\$225.00	0.9	\$202.50	Review time entries and calculate total hours per attorney
10/24/2023	Sabrina Grislis	Communication	\$225.00	0.1	\$22.50	Send Cimone Nunley chart with total hours per attorney
10/25/2023	Sabrina Grislis	Review/ Analyze	\$225.00	1.5	\$337.50	Review invoices from Amy Oppenheimer, confirm total amount paid and who made payment
10/25/2023	Sabrina Grislis	Review/ Analyze	\$225.00	1.5	\$337.50	Review invoices from Dr. Anthony Reading, confirm total paid and who made payment
10/25/2023	Sabrina Grislis	Communication	\$225.00	0.1	\$22.50	Email to Gustin Ham confirming AMF did not pay Dr. Reading final invoice

Date	User	Activity	Rate/Cost	Duration	Total	Description
10/25/2023	Sabrina Grislis	Paralegal	\$225.00	0.2	\$45.00	Submit payment to Dr. Anthony Reading's office
10/25/2023	Sabrina Grislis	Communication	\$225.00	0.1	\$22.50	Send time entries and excel sheet to Teodora Gagauz for review
10/25/2023	Sabrina Grislis	Review/ Analyze	\$225.00	0.8	\$180.00	Review invoices from Charles Mahla, confirm total
10/25/2023	Sabrina Grislis	Review/ Analyze	\$225.00	0.9	\$202.50	Update expenses per Larry Organ's review
10/25/2023	Sabrina Grislis	Draft/ Revise	\$225.00	0.8	\$180.00	Revise formatting of multiplier chart
10/25/2023	Sabrina Grislis	Paralegal	\$225.00	4	\$900.00	Review and prepare time entry chart for filing by fixing formatting for printing, making chart legible and readable for Judge, ensuring nothing is cut off
10/25/2023	Sabrina Grislis	Communication	\$225.00	0.1	\$22.50	Request Bernard Alexander resend exhibit 7 to his declaration
10/25/2023	Sabrina Grislis	Draft/ Revise	\$225.00	1.7	\$382.50	Finalize exhibits to declarations of Larry Organ, Michael Rubin, and Bernard Alexander
10/25/2023	Sabrina Grislis	Draft/ Revise	\$225.00	0.8	\$180.00	Prepare table of contents and table of authorities for Plaintiffs' motion for attorneys fees
10/25/2023	Sabrina Grislis	File/ Serve	\$225.00	0.3	\$67.50	File Plaintiffs' motion for attorneys' fees
10/25/2023	Sabrina Grislis	Draft/ Revise	\$225.00	0.5	\$112.50	Finalize Plaintiffs' motion for attorneys' fees by converting to PDF, affixing signatures, ensuring there are no blanks left.
10/25/2023	Sabrina Grislis	Draft/ Revise	\$225.00	0.2	\$45.00	Draft notice of motion and motion for attorneys' fees
10/26/2023	Sabrina Grislis	Communication	\$225.00	0.1	\$22.50	Send word version of proposed order to Judge Orrick's PO email
11/17/2023	Sabrina Grislis	Communication	\$225.00	0.1	\$22.50	Send Google Meets link to team
11/27/2023	Sabrina Grislis	Paralegal	\$225.00	1.1	\$247.50	Review time entries to search for source of discrepancy
11/28/2023	Sabrina Grislis	Communication	\$225.00	0.6	\$135.00	Phone call with Cimone Nunley about the total fees and hours; work on travel time entries.

Date	User	Activity	Rate/Cost	Duration	Total	Description
11/28/2023	Sabrina Grislis	Review/ Analyze	\$225.00	1.9	\$427.50	Review time entries to look for source of discrepancy; make updates to charts
12/1/2023	Sabrina Grislis	Review/ Analyze	\$225.00	1.8	\$405.00	Review travel time entries, make revisions by separating out travel time from appearance time.
12/3/2023	Sabrina Grislis	Review/ Analyze	\$225.00	4.2	\$945.00	Review travel time entries and separate out travel time from appearance time in new chart.
10/6/2023	Cimone Nunley	Research	\$500.00	1.3	\$650.00	Research Quinn Emmanuel and Sheppard Mullin's hourly rates
10/6/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Email to Bernard Alexander providing summary of witnesses he examined during retrial
10/6/2023	Cimone Nunley	Review/ Analyze	\$500.00	0.2	\$100.00	Review case file and send email to Michael Rubin, Dustin Collier, and Bernard Alexander requesting their time records and fee declarations
10/8/2023	Cimone Nunley	Review/ Analyze	\$500.00	1.9	\$950.00	Review and revise time records
10/9/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Email to Dustin Collier re our firm's billing rates
10/9/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Email to Michael Rubin re rates of all counsel involved in case
10/9/2023	Cimone Nunley	Review/ Analyze	\$500.00	5.7	\$2,850.00	Review and revise our firm's time records
10/9/2023	Cimone Nunley	Draft/ Revise	\$500.00	2.3	\$1,150.00	Draft attorneys' fees motion
10/11/2023	Cimone Nunley	Draft/ Revise	\$500.00	10	\$5,000.00	Draft motion for attorneys' fees and expenses
10/11/2023	Cimone Nunley	Review/ Analyze	\$500.00	1.6	\$800.00	Review CCRLG time entries and edit
10/12/2023	Cimone Nunley	Draft/ Revise	\$500.00	7.8	\$3,900.00	Draft motion for attorney's fees
10/12/2023	Cimone Nunley	Review/ Analyze	\$500.00	0.5	\$250.00	Review and correct time records from April 2023 to present
10/12/2023	Cimone Nunley	Review/ Analyze	\$500.00	0.8	\$400.00	Review and revise time records

Date	User	Activity	Rate/Cost	Duration	Total	Description
10/12/2023	Cimone Nunley	Draft/ Revise	\$500.00	4.3	\$2,150.00	Draft procedural history section of declaration of Larry Organ ISO motion for attorneys' fees
10/13/2023	Cimone Nunley	Communication	\$500.00	0.5	\$250.00	Call with Larry Organ re status of fee motion, issues related to fee motion
10/13/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Email to Michael Rubin, Jonathan Rosenthal, Corinne Johnson, Bernard Alexander, Dustin Collier, Larry Organ, and Marqui Hood to schedule brief meeting before meet and confer call with Tesla regarding fee motion; draft/send meeting agenda
10/13/2023	Cimone Nunley	Meet	\$500.00	0.5	\$250.00	meet with Michael Rubin, Larry ORgan, Marqui Hood, Corinne Johnson, bernard alexander re fee motion
10/13/2023	Cimone Nunley	Meet	\$500.00	0.7	\$350.00	Meet with Tesla's counsel regarding attorney's fee motion
10/13/2023	Cimone Nunley	Meet	\$500.00	0.4	\$200.00	Meet with Larry Organ, Michael Rubin, and Bernard Alexander re potential global settlement and briefing schedule for fee motion
10/13/2023	Cimone Nunley	Draft/ Revise	\$500.00	0.4	\$200.00	prepare joint stipulation for briefing schedule on motion for attorneys' fees
10/13/2023	Cimone Nunley	Review/ Analyze	\$500.00	0.1	\$50.00	Review edits to stipulation regarding briefing schedule for attorneys' fees from Michael Rubin; accept edits and send clean version to Bernard Alexander and Larry Organ for review
10/13/2023	Cimone Nunley	Review/ Analyze	\$500.00	0.4	\$200.00	Review edits to fee brief provided by Michael Rubin; send clean copy to Bernard Alexander, Larry ORgan, and Dustin Collier for review
10/16/2023	Cimone Nunley	Other	\$500.00	1.5	\$750.00	Prepare chart including all firms' time with multiplier applied
10/16/2023	Cimone Nunley	Other	\$500.00	0.9	\$450.00	Alter multiplier chart to reflect fees-on-fees time
10/16/2023	Cimone Nunley	Other	\$500.00	0.1	\$50.00	Revise multiplier chart and lodestar chart in fee motion to remove hours for Tracy Fehr and Josh Arnold and reflect updated rates for Navruz Avloni, Britt Karp, and Molly Durkin
10/16/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Review email from Michael Rubin regarding Tesla's proposed changes to stipulation regarding filing deadline for fee motion; revise stipulation to reflect new hearing date; send to Tesla counsel for review

Date	User	Activity	Rate/Cost	Duration	Total	Description
10/16/2023	Cimone Nunley	Review/ Analyze	\$500.00	0.8	\$400.00	Review and revise time records
10/16/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Call with Sabrina Grislis re reconciling meetings in time records; send time records to Sabrina Grislis
10/16/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Send stipulation re briefing schedule for fee motion to Sabrina Grislis; send word version to Judge Orrick's clerk
10/18/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Email to Michael Rubin re plan for completing motion for attorney's fees; email to Larry Organ, Dustin Collier, Bernard Alexander requesting their feedback by EOD today and reminding them of same; chat with Sabrina Grislis re plan for filing
10/20/2023	Cimone Nunley	Draft/ Revise	\$500.00	3.1	\$1,550.00	Revise motion for attorneys' fees
10/21/2023	Cimone Nunley	Research	\$500.00	1.8	\$900.00	Research proportionality of fees under Section 1988-- actually 1
10/21/2023	Cimone Nunley	Research	\$500.00	0.8	\$400.00	research issue re success obtained kerr factor
10/21/2023	Cimone Nunley	Draft/ Revise	\$500.00	1.1	\$550.00	Revise motion for attorneys' fees
10/22/2023	Cimone Nunley	Draft/ Revise	\$500.00	0.5	\$250.00	Revise fee motion
10/22/2023	Cimone Nunley	Research	\$500.00	0.7	\$350.00	Research cases applying multiplier when case was in public interest
10/23/2023	Cimone Nunley	Research	\$500.00	0.3	\$150.00	Research whether jury consultant fees are recoverable under Section 1988
10/23/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Call with Larry Organ re fee motion
10/24/2023	Cimone Nunley	Draft/ Revise	\$500.00	1.3	\$650.00	Revise Organ declaration in support of fee motion
10/24/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	Call with Larry Organ re addressing shared factual predicate of all claims in his declaration in support of fee motion
10/24/2023	Cimone Nunley	Communication	\$500.00	0.4	\$200.00	Call with Sabrina Grislis re finalizing time runs; tasks for finalizing motion tomorrow
10/24/2023	Cimone Nunley	Other	\$500.00	1.7	\$850.00	Review all billers' time for fee motion and recalculate multipliers based on date work performed

Date	User	Activity	Rate/Cost	Duration	Total	Description
10/24/2023	Cimone Nunley	Draft/ Revise	\$500.00	4.3	\$2,150.00	Revise fee motion to include citations from all declarations
10/24/2023	Cimone Nunley	Draft/ Revise	\$500.00	1	\$500.00	Cite-check fee brief
10/25/2023	Cimone Nunley	Draft/ Revise	\$500.00	0.2	\$100.00	Prepare proposed order to accompany motion for attorneys' fees
10/27/2023	Cimone Nunley	Draft/ Revise	\$500.00	0.2	\$100.00	Prepare corrected draft of fee motion and notice of errata
10/27/2023	Cimone Nunley	Communication	\$500.00	0.1	\$50.00	call with Larry Organ re errors in filed fee motion
10/27/2023	Cimone Nunley	Draft/ Revise	\$500.00	0.3	\$150.00	Revise notice of errata and fee motion; send to Michael Rubin and Larry Organ
10/27/2023	Cimone Nunley	Deposition	\$500.00	0.1	\$50.00	Revise notice of errata per feedback from Michael Rubin; send to Michael Rubin, Bernard Alexander, and Larry Organ
10/29/2023	Cimone Nunley	File/ Serve	\$500.00	0.2	\$100.00	File notice of errata
11/19/2023	Cimone Nunley	Meet	\$500.00	1	\$500.00	Meet with Larry Organ, Michael Rubin, Bernard Alexander, and Corrine Johnson re reply ISO fee motion
11/21/2023	Cimone Nunley	Draft/ Revise	\$500.00	3.6	\$1,800.00	Review Tesla's opposition to Plaintiff's motion for attorney's fees, and note to-do items and areas to research
11/23/2023	Cimone Nunley	Draft/ Revise	\$500.00	1.3	\$650.00	Draft reply ISO motion for attorneys' fees
11/25/2023	Cimone Nunley	Draft/ Revise	\$500.00	1.6	\$800.00	Draft reply ISO motion for attorneys' fees
11/26/2023	Cimone Nunley	Draft/ Revise	\$500.00	3.6	\$1,800.00	Draft reply ISO motion for attorney's fees
11/27/2023	Cimone Nunley	Draft/ Revise	\$500.00	4.1	\$2,050.00	Draft reply ISO motion for attorneys' fees
11/28/2023	Cimone Nunley	Communication	\$500.00	0.6	\$300.00	Call with Sabrina Grislis re creating chart of travel time entries for reply ISO motion for attorney's fees and updating total firm lodestar amount
11/28/2023	Cimone Nunley	Draft/ Revise	\$500.00	7.9	\$3,950.00	Draft reply brief ISO fee motion

Date	User	Activity	Rate/Cost	Duration	Total	Description
12/1/2023	Cimone Nunley	Draft/ Revise	\$500.00	1.7	\$850.00	Revise fee brief based on feedback from Michael Rubin and Corinne Johnson
12/2/2023	Cimone Nunley	Draft/ Revise	\$500.00	0.9	\$450.00	Revise brief based on feedback from Michael Rubin and Corinne Johnson
12/2/2023	Cimone Nunley	Draft/ Revise	\$500.00	0.7	\$350.00	Prepare chart of hours billed during second trial including description of time entries from all billers; circulate revised draft of motion reply and chart to Michael Rubin, Larry Organ, Bernard Alexander, and Marqui Hood for review

Exhibit 16

BRUCE LAZAR SMITH, Ph.D.

Tax ID# 555.70.9067

Clinical and Forensic Psychology

2041 Bancroft Way, Suite 310

Berkeley, CA 94704

Telephone: (510) 549-0909

Facsimile: (510) 649-1133

STATEMENT

June 4, 2018

California Civil Rights Law Group
 332 San Anselmo Avenue
 San Anselmo, CA 94960

Professional Services in the Case of Diaz, Di-az, and Patterson v. Tesla, Inc., et al.

Owen Diaz

May 23, 2018—Interview and Testing	5.0 hours
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May 23, 2018—Test scoring	0.5 hours
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June 2, 2018—Document Review	2.0 hours
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June 3, 2018—Report Preparation	2.5 hours
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June 4, 2018—Report Preparation	2.5 hours
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Demetric Di-az

May 21, 2018—Interview and Testing	4.5 hours
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May 21, 2018—Test scoring	0.5 hours
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May 31, 2018—Document Review	2.0 hours
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June 1, 2018—Preparation of Report	5.0 hours
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TOTAL	24.5 hours
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24.5 hours @ \$375.00/hour	\$9187.50
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Federal Express charges	17.50
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TOTAL DUE	\$9205.00
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Bruce L. Smith, Ph.D.
 Tax ID# 555.70.9067

Exhibit 17



Sabrina Grislis <sabrina@civilrightsca.com>

Re: Diaz, et al. v. Tesla: Trial Continued

1 message

Larry Organ <larryaorgan@gmail.com>

Wed, Jun 19, 2019 at 11:30 AM

To: Navruz Avloni <navruz@civilrightsca.com>

Cc: "kris@civilrightsca.com" <Kris@civilrightsca.com>, Sabrina Grislis <sabrina@civilrightsca.com>

yes, please send him the retainer check to day.



Lawrence A. Organ
332 San Anselmo Avenue
San Anselmo, CA 94960
(415)453-4740 phone
(415)785-7352 fax
www.civilrightsca.com

On Wed, Jun 19, 2019 at 9:04 AM Navruz Avloni <navruz@civilrightsca.com> wrote:

Will do. Larry is out next Tuesday for trial. Nothing urgent just new developments to update- we can have the call in a few weeks.

Sent from my iPhone

On Jun 19, 2019, at 8:28 AM, Michael Robbins <MRobbins@extti.com> wrote:

March 2 is fine. As to the time to meet, I just got back yesterday from trial testimony in the Bay Area, and am completely swamped today and then out in meetings Thursday Friday and Monday. Can we talk sometime on Tuesday? Right now my calendar is open that day.

In the meantime, although I have the signed retainer agreement, I do not yet have the retainer check of \$6000. I'd appreciate your getting that sent to me. Thanks

CALIFORNIA CIVIL RIGHTS LAW GROUP
332 SAN ANSELMO AVE.
SAN ANSELMO, CA 94960-2664
(415) 453-4740

2956

11-4288/1210 4268

6/19/19

Extti Incorporated
Six thousand and xx/100ths

6,000⁰⁰/₁₀₀



Wells Fargo Bank, N.A.
California
wellsfargo.com

NOT NEGOTIABLE



Diaz retainer 6-19

⑈000000 2956⑈

EXTTI, Incorporated
153 Stagecoach Road
Bell Canyon, CA 91307-1046
818-712-0203



Invoice submitted to:
Navruz Avloni, Esq.
California Civil Law Group
332 San Anselmo Avenue
San Anselmo, CA 94960

August 6, 2019

In Reference To: *Di-az, et al. v. Tesla, et al.*

	<u>Amount</u>
Previous balance	\$4,500.00
Balance due	<u>\$4,500.00</u>

The above constitutes an itemization for activity on the above matter during the past month.

**Please make checks payable to "Extti,
Incorporated"**

Mail to:
Extti, Incorporated
153 Stagecoach Road
Bell Canyon, CA 91307-1046

Federal Tax ID Number: 95-4685649